

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

DECEMBED

MAR 4 1985

OFFICE OF SOLID WASTE AND EMERGENCY RESPONSE

Mr. Neil E. Prange Environmental Protection Supervisor Monsanto Industrial Chemicals Co. 1700 South Second Street St. Louis, Missouri 63177

Dear Mr. Prange:

We have reviewed your letters of February 13, 1985 and December 20, 1984, notifying the Environmental Protection Agency (EPA) of your intent to dispose of materials contaminated with 2,3,7,8-tetrachlorodibenzop-dioxin (2,3,7,8-TCDD). We understand that four buildings at your plant site are contaminated with 2,3,7,8-TCDD, and that you wish to remove the contamination from three of the buildings according to your detailed proposal for cleaning 2,3,7,8-TCDD-contaminated building surfaces. We assume that you plan to decontaminate the fourth building according to this detailed proposal as well. In addition, we understand that the concentration of 2,3,7,8-TCDD ranges from 1.92 to 24.24 ppb, and that you expect to generate as much as two hundred fifty 25-gallon fiber drums which will be overpacked in 55-gallon steel drums. You have further indicated that you wish to dispose of the collected wastes at the Rollins Environmental Services' Incineration Facility in Deer Park, Texas.

From its review of both your letters and the detailed proposal, the Agency's Dioxin Disposal Advisory Group has no objections to your disposal plan. We recommend that the incinerator be operated under the conditions that have demonstrated a destruction and removal efficiency of 99.9999 percent for PCBs. If, however, you choose an alternative method, please be advised that you are required to submit a new notification 60 days prior to disposing of 2,3,7,8-TCDD-contaminated waste materials.

R00105741
RCRA RECORDS CENTER



If you have any questions concerning this response, please feel free to call Dr. Howard Fribush of the Office of Solid Waste on (202) 475-6678.

Sincerely yours,

Jack W. McGraw Acting Assistant Administrator